

Remarks

Claims 1-21 were presented for prosecution. Claims 1-11 were rejected under 35 USC 103(a) as being unpatentable over Wu (US 6,614,936) in view of Mishama (US 5,488,418). Claims 12-21 were rejected under 35 USC 103(a) as being unpatentable over De Bonet (6,510,177) in view of Strongin (US 5,872,866). Claims 1, 8 and 11 have been amended herein and claims 2 and 9 have been canceled. No new matter is believed added.

Applicants traverse the rejection of claims 1-21 for the following reasons. To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

With regard to claims 1-11, Applicants submit that the cited art fails to teach or suggest each of the claim limitations. For instance, claim 1 (and similarly claims 8 and 11) recites "an enhancement layer encoder that includes a plurality of discrete cosine transform (DCT) modules and a selection system for selecting one of the DCT modules, *wherein each of the plurality of DCT modules comprises a different precision.*" The Office Action alleges that this feature was taught by Figure 50B of Mishima. However, a careful reading of the related specification (columns 23 and 24) reveals that each of the DCT circuits 77 in Figure 50B are identical – hence they are all given the same reference numeral "77." The fact that each of the DCT circuits 77 is identical is also evident from

the fact that Figure 50B is a variation of Figure 50A, which utilizes a DCT of a single precision. Figure 50B merely places the DCT circuit 73 before the switch 72. The whole point of both circuits shown in Figures 50A and 50B is to provide adaptive blocking circuits 68-70 and 74-76. There is clearly no teaching or suggestion of providing a plurality of DCT modules of different precision. Accordingly, because the prior art fails to teach or suggest this feature, Applicants respectfully submit that claims 1-11 are not obvious in view of the cited art.

With regard to claims 12-21, Applicants submit that there is no suggestion or motivation, in the references themselves and in the knowledge generally available to one of ordinary skill in the art, to combine reference teachings as suggested in the Office Action. De Bonet explicitly teaches that "the amount of enhancement provided by the enhancement layer decoder module 280 may be varied to some degree (without any modification to the enhancement layer data) by decoding only the amount of information within the enhancement layer needed to provide the enhancement desired. This is accomplished in part by decoding more bits of information in the enhancement layer ..." (see column 16, lines 5-13). Thus, De Bonet specifically teaches away from the use of multiple IDCTs in order to reduce computational complexity. Instead, De Bonet teaches decoding more or fewer bits to vary computational resources. Accordingly, one skilled in the art would not be motivated to modify De Bonet in the manner suggested in the Office Action.

Moreover, Strongin fails to teach many of the features alleged in the Office Action. Strongin teaches a system in which (non-layered) DCT's are first preprocessed to set various DCT coefficients to zero, and then selects an IDCT based on the number of

non-zero coefficients. Accordingly, Strongin's system is not based on an available level of computational resources (claim 14), a preferred bit rate (claim 15), a required quality level (claim 16) or a communication bandwidth (claim 17). Instead, the selection of an IDCT is solely and exclusively based on the number of non-zero coefficients in the DCT. (See column 13, lines 32-36). In other words, the type of optimization is based only on the DCT itself, not any external requirements. Accordingly, because Strongin fails to teach or suggest these features, Applicants submit that these claims are not obvious in view of the cited art.

Applicants further submit that the dependent claims not specifically address herein are allowable for the reasons discussed above, as well as for their own additional features.

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



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Dated: 1/3/05

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